

Nicor Gas 1844 Ferry Road Naperville, IL 60563-9600 Mailing Address: P.O. Box 190 Aurora, IL 60507-0190 Phone 630 983-8676 Internet www.nicor.com

April 1, 2004

Attachment BOB-2 Page 1

Ms. Elizabeth A. Rolando Chief Clerk Illinois Commerce Commission 527 East Capitol Avenue Springfield, Illinois 62706

Dear Ms. Rolando:

As required by the Commission's order in Docket No. 03-0703, enclosed are the calculations of Northern Illinois Gas Company's d/b/a Nicor Gas Company Annual Reconciliation Balance for the reconciliation period ended December 31, 2003. The detailed statements included as pages 5 through 6 set forth, for each month of 2003, the recoverable gas costs and revenues recorded under the various Gas Supply Cost charges. Also included is the report of Deloitte & Touche LLP, independent public accountants, and an affidavit of an officer of the Company.

These statements have been prepared in accordance with the Commission's Amendatory Order of October 3, 1995, in Docket No. 94-0403, Uniform Purchased Gas Adjustment clause(s) (83 Illinois Administrative Code part 525).

As shown on Page 1 of the enclosure, the net reconciliation balance to be refunded is \$16,378,768.

The Company will provide the appropriate written testimony and exhibits based upon the schedule established in Docket No. 03-0703.

A copy of this filing is being sent to Mr. John Hendrickson, Rate Design Department and Mary Salvaggio, Manager of Accounting of the Commission in Springfield. An additional copy of this filing is also enclosed for your convenience in acknowledging its receipt.

Sincerely,

Albert E. Harms

Manager Rate Research

**Enclosures** 

Tel: (312) 946-3000 Fax: (312) 946-2600 www.deloitte.com

# **Deloitte** & Touche

To the Board of Directors Northern Illinois Gas Company 1844 Ferry Road Naperville, IL 60563

We have audited the accompanying statement, Reconciliation Balance for the Reconciliation Period Ended December 31, 2003 of Northern Illinois Gas Company (the Company). This statement is responsibility of the Company's management. Our responsibility is to express an opinion on this statement based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the statement is free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the statement. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall statement presentation. We believe that our audit provides a reasonable basis for our opinion.

The accompanying statement was prepared for the purpose of complying with Section G of Rider 6 of the Company's rate schedule in effect and on file with the Illinois Commerce Commission.

In our opinion, the statement referred to above presents fairly, in all material respects, the information set forth therein of Northern Illinois Gas Company for the reconciliation period ended December 31, 2003, in accordance with Rider 6 of the Company's rate schedule filed with the Illinois Commerce Commission.

This report is intended solely for the information and use of the Board of Directors and the management of Northern Illinois Gas Company and the Illinois Commerce Commission and is not intended to be and should not be used by anyone other than these specified parties.

Chicago, Illinois

Deloitte & Touche LLP

March 26, 2004

# NORTHERN ILLINOIS GAS COMPANY d/b/a NICOR GAS COMPANY

# RECONCILIATION BALANCE FOR THE RECONCILIATION PERIOD ENDED DECEMBER 31, 2003

Commodity Related Reconciliation (See Page 3 for detail)

Revenues Recorded Under Commodity Related	
Charges (Note 2)	\$ 1,532,572,126
Recoverable Commodity Related Costs (Note 3)	<u>1,511,042,989</u>
Balance to be Refunded under Section E	\$ 21,529,137
2002 Over-collect included in Illinois Commerce Commission Docket # 02-0067	(6,864,375)
2003 Balance to be Refunded on the PGA	\$ 14,664,762
Non-Commodity Related Reconciliation (See Page 4 for detail)	
Revenues Recorded Under Non-Commodity Related	
Charges (Notes 4)	\$ 126,054,072
Recoverable Non-Commodity Related Costs (Note 5)	112,410,592
Balance to be Refunded under Section E	\$ 13,643,480
2002 Over-collect included in Illinois Commerce Commission Docket # 02-0067	(11,929,474)
2003 Balance to be Refunded on the PGA	\$ 1,714,006
Total Reconciliation	
Revenues Recorded	\$ 1,658,626,198
Recoverable Costs	1,623,453,581
Total Balance to be Refunded	\$ 35,172,617
2002 Over-collect included in Illinois Commerce Commission Docket # 02-0067 (Note 7)	(18,793,849)
2003 Balance to be Refunded on the PGA	\$ 16,378,768

#### Notes:

#### 1. Basis of Presentation

Nicor Gas maintains its financial books and records in accordance with accounting standards generally accepted in the United States of America. These statements have been prepared from the financial books and records of the Company in accordance with the annual reconciliation provision of Section G of Rider 6 of the Company's rate schedule in effect and on file with the Illinois Commerce Commission.

#### 2. Revenues Recorded Under Commodity Related Charges

Revenue arising: (1) through application of the Commodity Gas Cost charge (CGC) component of the Gas Cost charge (GC) to therms sold; (2) through application of the Transition Surcharge to customerowned therms delivered under Rate 74 (General Transportation Service), Rate 76 (Large General Transportation Service), Rate 81 (Energy Transportation Service), and Rider 25 (Firm Transportation Service); (3) from estimated unbilled service; (4) under the Unauthorized Use Charge provisions of Rate 74, Rate 76, Rate 77, and Rate 81, and Rider 13, exclusive of gas costs; (5) under the Excess Storage Charge provisions of Rate 74, Rate 76, Rate 77, Rate 81, and Rider 25 and Rider 13; and (6) exclusive of Standard Rider 5 revenue and interest.

#### 3. Recoverable Commodity Related Costs

The Commodity Gas Costs recoverable through the Gas Supply Cost (as recorded on the books of the Company for 2003).

### 4. Revenues Recorded Under Non-Commodity Related Charges

Revenue arising: (1) through application of the Non-Commodity Gas Cost charge (NCGC) component of the Gas Cost charge (GC) to therms sold; (2) through application of the Demand Gas Cost charge (DGC) to Firm Backup Service levels of customers; (3) through application of the Aggregator Balancing Service Charge to customer-owned therms delivered under Rider 15, Customer Select Pilot Program and billed to suppliers providing service to such customers under Rider 16, Supplier Aggregation Service; (4) from estimated unbilled service; and (5) exclusive of interest.

Application of the Non-Commodity Gas Cost charge (NCGC) and Demand Gas Cost charge (DGC), pursuant to the Commission's Orders in Docket Nos. 88-0277 and 95-0219. The NCGC is applicable at the full calculated level to therms sold by the Company, and Authorized and Unauthorized Use therms sold to Rate 74, Rate 76, Rate 77, Rate 81, and Rider 13. The DGC is applicable to forty percent of Maximum Daily Contract Quantity (MDCQ) for Rate 6, Rate 7, and Rider 25, and to the elected level of Firm Backup Service for Rate 74, Rate 76, Rate 77, and Rate 81.

# 5. Recoverable Non-Commodity Related Charges

Non-Commodity Gas Costs recoverable through the Gas Supply Cost (as recorded on the books of the Company for 2003).

## 6. Performance-Based Rate (PBR) Plan.

Nicor Gas' PBR plan for natural gas costs went into effect in 2000 and was terminated by the company effective January 1, 2003. Under the PBR plan, Nicor Gas' total gas supply costs were compared to a market-sensitive benchmark. Savings and losses relative to the benchmark

were determined annually and shared equally with sales customers. These savings and losses were a component of recoverable commodity and non-commodity related costs in prior years. The PBR plan is currently under Illinois Commerce Commission (ICC) review.

There are allegations that the company acted improperly in connection with the PBR plan, and the ICC and others are reviewing these allegations. On June 27, 2002 the Citizens Utility Board (CUB) filed a motion to reopen the record in the ICC's proceedings to review the PBR plan (the ICC Proceedings). As a result of the motion to reopen, Nicor Gas, the Cook County State's Attorney Office (CCSAO), the staff of the ICC and CUB entered into a stipulation providing for additional discovery. The Illinois Attorney General's Office has also intervened in this matter. In addition, the Illinois Attorney General's Office issued Civil Investigation Demands (CIDs) to CUB and the ICC staff. The CIDs ordered that CUB and the ICC staff produce all documents relating to any claims that Nicor Gas may have presented, or caused to be presented, false information related to its PBR plan. Parties who were plaintiffs in a dismissed class action proceeding against the company could potentially intervene in these proceedings. The company has committed to cooperate fully in the reviews of the PBR plan.

In response to these allegations, on July 18, 2002, the Nicor Board of Directors appointed a special committee of independent, non-management directors to conduct an inquiry into issues surrounding natural gas purchases, sales, transportation, storage and such other matters as may come to the attention of the special committee in the course of its investigation. The special committee presented the report of its counsel (Report) to Nicor's Board of Directors on October 28, 2002.

In response, the Nicor Board of Directors directed the company's management to, among other things, make appropriate adjustments to account for, and fully address the adverse consequences to ratepayers of the items noted in the Report. These adjustments were reflected in prior years Reconciliation Balance statements. In addition, Nicor Gas estimates that there is \$26.9 million due to the company from the 2002 PBR plan year, which has not been recognized in any Reconciliation Balance statement due to uncertainties surrounding the PBR plan.

Pursuant to the agreement of all parties, including the company, the ICC re-opened the 1999 and 2000 purchased gas adjustment filings for review of certain transactions related to the PBR plan and consolidated the reviews of the 1999-2002 purchased gas adjustment filings with the PBR plan review.

On February 5, 2003, the CCSAO and CUB filed a motion for \$27 million in sanctions against the company in the ICC Proceedings. In that motion, CCSAO and CUB alleged that Nicor Gas' responses to certain CUB data requests were false. Also on February 5, 2003, CUB stated in a press release that, in addition to \$27 million in sanctions, it would seek additional refunds to consumers. On March 5, 2003, the ICC staff filed a response brief in support of CUB's motion for sanctions. On May 1, 2003, the Administrative Law Judges issued a ruling denying CUB and CCSAO's motion for sanctions. CUB has filed an appeal of the motion for sanctions with the ICC, and the ICC has indicated that it will not rule on the appeal until the final disposition of the ICC proceedings. It is not possible to determine how the ICC will resolve the claims of CCSAO, CUB or other parties to the ICC Proceedings.

In November 2003, the ICC staff, CUB, CCSAO and the Illinois Attorney General's Office (IAGO) filed their respective direct testimony in the ICC Proceedings. The ICC staff is seeking

refunds to customers of approximately \$108 million and CUB and CCSAO were jointly seeking refunds to customers of approximately \$143 million. The IAGO direct testimony alleges adjustments in a range from \$145 million to \$190 million. The IAGO testimony as filed is presently unclear as to the amount which IAGO seeks to have refunded to customers. On February 27, 2004 the above referenced intervenors filed their rebuttal testimony in the ICC Proceedings. In such rebuttal testimony, CUB and CCSAO amended the alleged amount to be refunded to customers from approximately \$143 million to \$190 million. Nicor Gas filed rebuttal testimony in January 2004, which is consistent with the findings of the special committee Report and seeks a reimbursement to Nicor Gas of approximately \$2.8 million.

Nicor Gas is unable to predict the outcome of any of the foregoing reviews or the effect on this Reconciliation Balance. Because the PBR plan and historical gas costs are still under ICC review, the final outcome could be materially different than the amounts reflected in this or prior Reconciliation Balance statement.

#### 7. 2002 Over-collect included in Illinois Commerce Commission Docket # 02-0067

Nicor Gas' Reconciliation Balance sheets do not include a reversal of April's Amortization of Previous Years RB of (\$6,864,375) on the Commodity Related Reconciliation Balance sheet and (\$11,929,474) on the Non-Commodity Related Reconciliation Balance sheet. Since the PGA filing effective May 2003 included the reversal of these amounts, Page 1 shows that difference (\$18,793,849) from the amount to be refunded from 2003. The total amount of these two refunds are included in the total Requested Factor O of (\$20,665,230) for 2002 which is being considered by the Illinois Commerce Commission in Docket No. 02-0067.

#### Attachment BOB-2 Page 7

#### NORTHERN ILLINOIS GAS COMPANY d/b/a NICOR GAS COMPANY

#### COMMODITY RELATED RECONCILIATION BALANCE STATEMENT OF REVENUES AND RECOVERABLE COSTS FOR THE RECONCILATION PERIOD ENDED DECEMBER 31, 2003

	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	2003 TOTAL
REVENUES RECORDED UNDER	JANUARI	FEBRUARI	WARCH	AFRIL	IVIAI	JUNE	JULT	AUGUST	SEFIEMBER	OCTOBER	NOVEWIDER	DECEMBER	TOTAL
COMMODITY CHARGES													
COMMODITY GAS CHARGE (CGC)	\$266,944,443	\$233,593,884	\$271,879,702	\$122,702,574	\$59,357,328	\$37,189,915	\$37,351,207	\$33,825,610	\$34,628,826	\$74,788,017	\$141.596.412	\$216,154,700	\$1,530,012,618
EXCESS STORAGE CHARGES	75,253	17,822	21,284	66,821	20,415	24,236	60,674	1,530,950	(1,603,087)	(6,543)	38,333	108,080	354,238
STORAGE SERVICES	118,332	155,382	134,746	124,002	124,002	242,891	181,809	158,691	153,589	150,264	150,092	159,424	1,853,224
UNAUTHORIZED USE CHARGE	0	0	418,651	(34,195)	(1,817)	(440)	0	(97)	0	0	0	0	382,102
RIDER 5 REVENUES	120,872	111,283	81,503	50,492	26,291	14,636	(16,274)	(20,269)	(15,508)	(31,168)	(56,384)	(86,769)	178,705
INTEREST ON REFUNDS	8,773	526	35,215	3,234	(34,331)	(68,745)	(48,208)	(47,969)	(48,006)	(20,519)	0	11,269	(208,761)
TOTAL	\$267,267,673	\$233,878,897	\$272,571,101	\$122,912,928	\$59,491,888	\$37,402,493	\$37,529,208	\$35,446,916	\$33,115,814	\$74,880,051	\$141,728,453	\$216,346,704	\$1,532,572,126
RECOVERABLE COMMODITY													
RELATED COSTS													
FIRM SUPPLY	\$ 179,556,104	\$ 218,899,592	\$ 229,627,512	\$ 27,050,664	\$ 10,340,018	\$36,543,809	\$18,580,670	\$25,800,195	\$40,741,342	\$39,542,004	\$54,490,346	\$103,124,538	\$984,296,794
SPOT GAS PURCHASES	20,961,422	43,380,132	72,443,456	133,461,550	147,793,663	127,883,556	121,666,624	114,688,896	80,085,139	106,312,747	27,176,387	2,240,283	998,093,855
OFF-SYSTEM SUPPLY SALES	(20,997,488)	(25,531,566)	(65,748,582)	(8,575,537)	(10,061,838)	(21,204,536)	(8,302,360)	(5,176,356)	(22,872,612)	(14,004,704)	(5,109,176)	(16,278,545)	(223,863,300)
INVENTORY ACTIVITY	128,969,245	71,464,598	71,187,629	(60,365,818)	(88,009,326)	(104,316,574)	(120,359,641)	(119,741,407)	(79,488,863)	(79,750,692)	55,433,083	134,471,593	(190,506,173)
HEDGING COST	3,759,322	(13,883,145)	(1,467,577)	360,824	0	54,347	4,012,614	4,953,326	2,554,924	6,518,096	6,234,850	2,344,705	15,442,286
PURCHASED STORAGE SERVICE	0	63	0	0	0	596	0	118	399	0	51,927	1,435,702	1,488,805
RECOVERY FROM HITS BY CONTRACTOR	0	0	0	0	0	0	0	0	0	0	0	(161,888)	(161,888)
AMORTIZATION OF REFUNDS	0	0	0	0	0	(47,096)	0	0	0	0	0	0	(47,096)
AMORTIZATION OF PREVIOUS YEARS RB	(22,174,251)	(36,500,000)	(8,162,347)	(6,864,375)	0	0	0	0	0	0	0	0	(73,700,973)
AUTHORIZED OVER-RUN CHARGES	0	12	1	0	666	0	0	0	0	0	0	0	679
TOTAL	\$290,074,354	\$257,829,686	\$297,880,092	\$85,067,308	\$60,063,183	\$38,914,102	\$15,597,907	\$20,524,772	\$21,020,329	\$58,617,451	\$138,277,417	\$227,176,388	\$1,511,042,989
COMMODITY RELATED OVER / (UNDER ) COLLECTION	(\$22,806,681)	(\$23,950,789)	(\$25,308,991)	\$37.845.620	(\$571,295)	(\$1,511,609)	\$21,931,301	\$14.922.144	\$12.095.485	\$16.262.600	\$3,451,036	(\$10,829,684)	\$21,529,137
OVER / (UNDER ) COLLECTION	(\$22,800,681)	(\$23,950,789)	(⊅∠5,308,991)	<b></b> გა <i>1</i> ,845,620	(\$571,∠95)	(\$1,511,609)	<b>₹21,931,301</b>	<b>⊅14,922,144</b>	<b>⊅12,095,485</b>	<b>⊅10,∠0∠,000</b>	<b>\$3,451,036</b>	(\$10,829,684)	\$21,52

#### NORTHERN ILLIONOIS GAS COMPANY d/b/a NICOR GAS COMPANY NON-COMMODITY RELATED RECONCILIATION BALANCE

STATEMENT OF REVENUES AND RECOVERABLE GAS COSTS FOR THE RECONCILATION PERIOD ENDED DECEMBER 31, 2003

	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	2003 TOTAL
REVENUES RECORDED UNDER													
NON-COMMODITY RELATED CHARGES													
DGC AND NCGC	\$27,533,984	\$25,372,421	\$16,000,442	\$6,461,339	\$5,189,705	\$2,577,955	\$2,294,644	\$2,377,259	\$2,542,421	\$5,067,478	\$9,273,601	\$13,448,659	\$118,139,908
AGGREGATOR BALANCE SERVICE CHARGE	1,171,427	1,814,413	1,473,700	1,147,356	574,696	253,002	105,601	116,102	138,137	175,295	338,901	605,534	7,914,164
SUBTOTAL	\$28,705,411	\$27,186,834	\$17,474,142	\$7,608,695	\$5,764,401	\$2,830,957	\$2,400,245	\$2,493,361	\$2,680,558	\$5,242,773	\$9,612,502	\$14,054,193	\$126,054,072
RECOVERABLE NON-COMMODITY													
RELATED COSTS													
FIRM SUPPLY	\$ 9,902,230	\$ 9,845,002	\$ 8,396,903	\$ 7,103,190	\$ 6,772,709	\$ 6,884,541	\$ 6,884,319	\$ 6,884,545	\$ 7,038,828	\$ 7,205,815	\$ 8,207,308	\$ 9,441,929	\$94,567,319
FERC ORDER 636 TRANSITION CHARGE	11,313	11,313	11,313	(11,313)	0	0	0	0	0	0	0	0	22,626
DEMAND AND OTHER CREDITS	(730,588)	(1,172,390)	20,479,601	(89,315)	(840,826)	(364,851)	(133,062)	(514,111)	433,611	(955,831)	(118,196)	(3,394,456)	12,599,586
PURCHASED STORAGE SERVICE	3,145,022	2,476,016	(4,851,368)	(1,125,065)	3,321,204	3,375,300	3,375,300	3,375,300	3,375,300	3,375,300	3,622,175	3,709,496	27,173,980
AMORTIZATION OF PREVIOUS YEARS RB	(10,023,445)	0	0	(11,929,474)	0	0	0	0	0	0	0	0	(21,952,919)
TOTAL	\$2,304,532	\$11 1E0 041	\$24.026.440	(\$6.0E4.077)	¢0.252.007	£0.904.000	¢40.426.557	¢0.745.724	\$40 947 720	\$0.62E.204	\$11.711.287	¢0.756.060	\$442.440.E02
TOTAL	\$Z,3U4,53Z	\$11,159,941	\$24,036,449	(\$6,051,977)	\$9,253,087	\$9,894,990	\$10,126,557	\$9,745,734	\$10,847,739	\$9,625,284	<b>Φ11,/11,28</b> /	\$9,756,969	\$112,410,592
NON-COMMODITY RELATED													
OVER / (UNDER) COLLECTION	\$26,400,879	\$16,026,893	(\$6,562,307)	\$13,660,672	(\$3,488,686)	(\$7,064,033)	(\$7,726,312)	(\$7,252,373)	(\$8,167,181)	(\$4,382,511)	(\$2,098,785)	\$4,297,224	\$13,643,480

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#### Northern Illinois Gas Company d/b/a Nicor Gas Company Docket No. 03-0703 PGA Reconciliation for the Year Ended December 31, 2003

#### **Commodity Gas Cost**

Line	Description	Restatement	Adjustments	Per Filings
<u>Line</u> 1	Unamortized Balance as of 12/31/02 per 2002 Reconciliation	(28,162,343)	0	(28,162,343)
2	Factor A Adjustments Amortized to Schedule 1 at 12/31/02 per 2002 Reconciliation	(38,674,251)	0	(38,674,251)
3	Factor O Collected/(Refunded) during 2002	(16,436,405)	(16,436,405) *	0_
4	Balance to be Collected/(Refunded) during 2003 from prior periods (sum of lines 1 thru 3)	(\$83,272,999)	(\$16,436,405) *	(\$66,836,594)
5	2003 Gas Costs	1,584,054,718		1,584,054,718
6	2003 PGA Revenues	(1,532,044,551)		(1,532,044,551)
7	Pipeline Surcharges/(Refunds)	(47,096)		(47,096)
8	Other Adjustments	0		0
9	Interest	208,761		208,761
10	2003 Under/(Over) Recovery (sum of lines 5 thru 9)	\$52,171,832		\$52,171,832
		(24.424.42=)	(40,400,40=) +	(44.004.700)
11	Under/(Over) Recovery Balance at 12/31/03 (line 4 + line 10)	(31,101,167)	(16,436,405) *	(14,664,762)
12	Factor A Adjustments Amortized to Schedule 1 at 12/31/03	(14,664,762)		(14,664,762)
13	Unamortized Balance at 12/31/03 (per filing truing up actual for December 2003)	(16,436,405)	(16,436,405) *	0
14	Requested Factor O (line 11 - line 12 - line 13)	\$0	\$0	\$0

<sup>\*(\$16,436,405)</sup> is included in the (\$20,665,230) 2002 over-collect that is included in Illinois Commerce Commission Docket # 02-0067

#### Northern Illinois Gas Company d/b/a Nicor Gas Company Docket No. 03-0703 PGA Reconciliation for the Year Ended December 31, 2003

### **Non-Commodity Gas Cost**

	Description	Restatement	Adjustments	Per Filings
<u>Line</u> 1	Unamortized Balance as of 12/31/02 per 2002 Reconciliation	0	0	0
2	Factor A Adjustments Amortized to Schedule 1 at 12/31/02 per 2002 Reconciliation	(10,023,453)	0	(10,023,453)
3	Factor O Collected/(Refunded) during 2002	(4,228,825)	(4,228,825) *	0
4	Balance to be Collected/(Refunded) during 2003 from prior periods (sum of lines 1 thru 3)	(\$14,252,278)	(\$4,228,825) *	(\$10,023,453)
5	2003 Gas Costs	126,449,355		126,449,355
6	2003 PGA Revenues	(118,139,908)		(118,139,908)
7	Pipeline Surcharges/(Refunds)	0		0
8	Other Adjustments	0		0
9	Interest	0		0
10	2003 Under/(Over) Recovery (sum of lines 5 thru 9)	\$8,309,447		\$8,309,447
11	Under/(Over) Recovery Balance at 12/31/03 (line 4 + line 10)	(5,942,831)	(4,228,825) *	(1,714,006)
12	Factor A Adjustments Amortized to Schedule 1 at 12/31/03	(1,714,006)	0	(1,714,006)
13	Unamortized Balance at 12/31/03 (per filing truing up actual for December 2003)	(4,228,825)	(4,228,825) *	0
14	Requested Factor O (line 11 - line 12 - line 13)	\$0	\$0	\$0

 $<sup>^{\</sup>star}(\$4,\!228,\!825) \text{ is included in the } (\$20,\!665,\!230) \text{ 2002 over-collect that is included in Illinois Commerce Commission Docket } \# \text{ 02-0067}$ 

STATE OF ILLINOIS	)
	)
COUNTY OF DUPAGE	)

## **VERIFICATION**

George M. Behrens, being first duly sworn, states that he is Vice President Administration and Treasurer of Northern Illinois Gas Company d/b/a Nicor Gas Company; that he has read the foregoing Statement by him subscribed and knows the contents thereof; and that the statements therein contained are true to the best of his knowledge and belief.

Vice President Administration and Treasurer

SUBSCRIBED AND SWORN TO,

Before me this 30 day of March, 2004.

My commission expires:

OFFICIAL SEAL Notary Public - State of Illinois

February 26, 2007

WENDY L. BEDAL

My Comm Expires February 26, 2007